

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION

In Re:	}
Bryan L White	} Case No. 19-90175-AKM-13
Rebekah A. White	}
Debtors	}

**CORRECTED MOTION TO SELL AT PRIVATE SALE**  
**AND NOTICE OF OBJECTION DEADLINE**

The Debtor hereby moves the court, pursuant to 11 U.S.C. § 363(b) and (f) and Local Rule B-6004-2, to approve the sale of property as described below and state as follows:

1. The property to be sold is: 25080 Apple Blossom Drive, West Harrison, Indiana 47060.
2. The Prospective Purchaser is: Timothy Kyle & Brooke Elizabeth Berkemeier, 6886 Taylor Road, Cincinnati, OH 45248
3. The sale price and an estimate of the net proceeds to be received by the estate are: A sale price of \$268,000.00 and after the satisfaction of any anticipated judgment liens against the property, accrued taxes, and other costs and expenses of the sale as summarized in the Seller's Estimated Net Proceeds attached hereto as Exhibit A, the Debtors will claim the maximum exemption amount allowed for under Indiana Code § 34-55-10-2(c)(1). The Debtors will claim \$38,600.00 from the sale. The Debtors' bankruptcy estate shall receive the remaining sale proceeds to pay the bankruptcy estate in full.
4. The property was marketed for sale as follows: The property was marketed for sale by the owner and only one offer was considered.

5. There are no known relationships between the prospective purchaser and the Debtor or the Standing Trustee.
6. The proposed sale seeks to sell the property free and clear of all liens. The first mortgage lien held by Amerifirst Home Mortgage will be paid in full at closing.

**NOTICE: Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the court to enter an order approving the sale, or if you want the court to consider your views on the motion, then within **21 days** from the date of service or such other time period as may be permitted by Fed.R.Bankr.P.9006(f), you or your attorney must file with the Bankruptcy Clerk a written objection explaining your position.

Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

U.S. Bankruptcy Court  
110 U.S. Courthouse  
121 W. Spring Street  
New Albany, Indiana 47150

The objecting party must ensure delivery of the objection to the party filing the motion and to the Trustee. **If an objection is NOT timely filed, the requested relief may be granted.**

**WHEREFORE**, the Debtor moves the court to enter an order approving the sale and granting such other relief as appropriate.

Respectfully submitted,

KOEHLER LAW OFFICE

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Lloyd E. Koehler  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 15th day of April, 2022, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Joseph M. Black, Jr., Chapter 13 Trustee: [jmbeef@trustee13.com](mailto:jmbeef@trustee13.com)  
U.S. Trustee: [ustpreregion10.in.ecf@usdoj.gov](mailto:ustpreregion10.in.ecf@usdoj.gov)

A copy of the foregoing was sent on the 15th day of April, 2022 via certified mail to the following:

Attorney General of the United States, U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington, DC 20530-0001

U.S. Attorney's Office, Southern District of Indiana, 10 West Market Street Suite 2100, Indianapolis, IN 46204

Highest Ranking Officer, Amerifirst Home Mortgage, 950 Trade Centre Way, Suite 400, Kalamazoo, MI 49002.

I further certify that a true copy of the foregoing motion was sent via U.S. Mail this 15th day of April, 2022 to all parties attached hereto:

/s/ Lloyd E. Koehler  
Lloyd E. Koehler